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*Attorneys for Plaintiff
Americans for Prosperity*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AMERICANS FOR PROSPERITY,

Plaintiff,

v.

GURBIR GREWAL, in his official capacity as Attorney General of New Jersey, **ERIC H. JASO**, in his official capacity as Chairperson of the New Jersey Election Law Enforcement Commission, **STEPHEN M. HOLDEN**, in his official capacity as Commissioner of the New Jersey Election Law Enforcement Commission, and **MARGUERITE T. SIMON**, in her official capacity as Commissioner of the New Jersey Election Law Enforcement Commission,

Defendants.

Civil Action No. 3:19-cv-14228

ECF Case

**NOTICE OF MOTION FOR A
PRELIMINARY INJUNCTION**

Return Date: August 5, 2019

Oral argument requested

Document Electronically filed.

* *Pro hac vice* applications to be submitted.

PLEASE TAKE NOTICE that on Monday, August 5, 2019 at 9:00 a.m., or on such other date and time as determined by the Court, Plaintiff, Americans for Prosperity (“AFP”), through its attorneys, Marino, Tortorella & Boyle, P.C., and Quinn Emanuel Urquhart & Sullivan, LLP, will move before the United States District Court for the District of New Jersey, for entry of an Order, pursuant to Federal Rule of Civil Procedure 65, preliminarily enjoining Defendants, Gurbir Grewal, in his official capacity as Attorney General of New Jersey; Eric H. Jaso, in his official capacity as Chairperson of the New Jersey Election Law Enforcement Commission; Stephen M. Holden, in his official capacity as Commissioner of the New Jersey Election Law Enforcement Commission; and Marguerite T. Simon, in her official capacity as Commissioner of the New Jersey Election Law Enforcement Commission, from enforcing the provisions in New Jersey Senate Bill No. 150 (“the Act”) compelling disclosure of donor information and compliance with the Act’s reporting requirements for independent expenditure committees.

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, AFP will rely on the Memorandum of Law and Declarations of Keith H. Forst, Emily Seidel, Nicholas Dunn, and Erica Jedynak, which are submitted herewith. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that AFP respectfully requests oral argument on this motion.

Dated: June 25, 2019

Respectfully submitted,

MARINO, TORTORELLA & BOYLE, P.C.

/s/ Kevin H. Marino

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